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8 *Attorneys for State Defendants*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 ROGER PALMER; CHAD MOXLEY; and
13 FIREARMS POLICY COALITION, INC.,

Case No. 3:21-cv-00268-MMD-CSD

14 Plaintiffs,

15 vs.

16 STEPHEN SISOLAK, Governor of Nevada;
17 AARON FORD, Attorney General of Nevada;
GEORGE TOGLIATTI, Director of the
Nevada Department of Public Safety;
MINDY MCKAY, Administrator of the
Records, Communications, and Compliance,
Division of the Nevada, Department of Public
Safety;

20 Defendants.

18 **JOINT STATUS REPORT**

22 On July 21, 2023, counsel for Plaintiffs and counsel for Defendants met and
23 conferred to discuss how best to develop the factual and historical record in this case as
discussed in the Ninth Circuit's Order. The Parties believe the following process would be
25 sufficient to develop such a record: fact discovery (written discovery and fact witness
depositions); expert discovery (as either party may deem necessary); briefing of the parties
27 in which each side proposes a set of findings based on the record developed; and, if the
Court desires, a hearing at which the parties present further argument and/or address

1 further questions of the Court in resolving the matter. The parties accordingly propose the
 2 following deadlines:

Event	Deadline
Close of fact discovery	90 days from the Court's order establishing the specific discovery plan
Initial expert disclosures due (if any)	30 days from close of fact discovery
Rebuttal expert disclosures due (if any)	30 days from initial disclosure deadline
Close of expert discovery (if any) ¹	30 days from rebuttal disclosure deadline
Parties' Proposed Findings of Fact due	30 days from close of expert discovery ²

10 The Parties are amenable to appearing before the Court for a status conference if
 11 the Court would find it helpful in setting the parameters of the discovery and briefing
 12 period.

13 DATED this 24th day of July, 2023.

14 AARON D. FORD
 Attorney General

THE DiGUISEPPE LAW FIRM

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19 *Attorneys for Plaintiffs*

27 ¹ The Parties anticipate taking expert witness depositions, if any, within the thirty
 (30) days following rebuttal expert disclosures.

28 ² Should the Parties forego expert discovery, proposed findings of fact will be due
 thirty (30) days from close of fact discovery.